

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LABEL\$DOLLARS, CORP.,)	
)	
Plaintiff/Counterclaim Defendant,)	C.A. No. 06-594 (JJF)
)	
v.)	
)	
PREMARK FEG, L.L.C.,)	JURY TRIAL DEMANDED
)	
Defendant/Counterclaim Plaintiff.)	
)	

ANSWER TO COUNTS III-V

Defendant Premark FEG, L.L.C. ("Premark"), through its attorneys, hereby answers Counts III through V of Plaintiff Label\$Dollars, Corp.'s ("Plaintiff" or "Label Dollars") Complaint by stating as follows:

**COUNT III
(DECLARATORY JUDGMENT OF SOLE INVENTORSHIP)**

25. Defendant repeats and incorporates by reference its responses in Paragraphs 1 through 24 of its Answer. (D.I. 8).
26. Defendant denies the allegations contained Paragraph 26 of the Complaint.
27. Defendant admits that Schuller is the named inventor of the '038 Patent. Defendant denies the remaining allegations contained Paragraph 27 of the Complaint.
28. Defendant denies the allegations contained Paragraph 28 of the Complaint.
29. Defendant denies the allegations contained Paragraph 29 of the Complaint.
30. Defendant denies the allegations contained Paragraph 30 of the Complaint.

**COUNT IV
(DECLARATORY JUDGMENT OF JOINT INVENTORSHIP)**

31. Defendant repeats and incorporates by reference its responses in Paragraphs 1 through 30 of its Answer. (D.I. 8).
32. Defendant denies the allegations contained in Paragraph 32 of the Complaint.
33. Defendant denies the allegations contained in Paragraph 33 of the Complaint.
34. Defendant denies the allegations contained in Paragraph 34 of the Complaint.
35. Defendant denies the allegations contained in Paragraph 35 of the Complaint.

**COUNT V
(CONSTRUCTIVE TRUST)**

36. Defendant repeats and incorporates by reference its responses in Paragraphs 1 through 35 of its Answer. (D.I. 8).
37. Defendant denies the allegations contained in Paragraph 37 of the Complaint.
38. Defendant admits that Schuller is the named inventor of the '038 Patent. Defendant denies the remaining allegations contained Paragraph 38 of the Complaint.
39. Defendant denies the allegations contained in Paragraph 39 of the Complaint.

SEPARATE DEFENSES

Without waiver, limitation, or prejudice, Defendant hereby incorporates by reference the Separate Defenses contained in its original Answer to the Complaint. (D.I. 8).

JURY DEMAND

Premark hereby demands a trial by jury of any and all issues triable of right before a jury.

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Dated: August 10, 2007

*Attorneys for Defendant/Counterclaim
Plaintiff Premark FEG, L.L.C.*

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2007, I caused to be served by hand delivery the following document and electronically filed the same with the Clerk of County using CM/ECF which will send notification of such filing(s) to the following:

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I hereby certify that on August 10, 2007, I have sent by Federal Express the foregoing document to the following non-registered participants:

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